

# **Exhibit A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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GUO WENGUI, )  
Plaintiff, )  
v. ) Civil Action No. PWG-18-259  
HONGKUAN LI, )  
Defendant. )  
)

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**DECLARATION OF GUO WENGUI**

I, Guo Wengui, have executed this declaration on the 23<sup>rd</sup> day of July, 2019. I declare under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and am competent to testify to the matters herein.
2. China Golden Spring Group (Hong Kong) Ltd. ("China Golden Spring"), a Hong Kong company owned and operated by my family, entered into a consulting agreement with ACA Investment Management Limited ("ACA") in January 2017 (the "Consulting Agreement"). ACA is an investment management company that manages capital for world renowned institutional investors. ACA's focus is on capital investment opportunities in Asia, especially in the greater China region. China Golden Spring was hired because of my reputation in the Asian business community; my knowledge and expertise of doing business throughout the world, but in particular China and Hong Kong; and because I had the ability to make introductions to numerous business executives in China and Hong Kong.

3. Between January 2017 and February 2018, when ACA terminated the Consulting

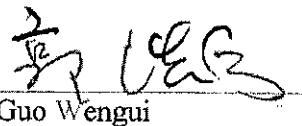
Agreement, China Golden Spring was paid HKD\$56,114,857.35 (approximately \$7,177,000 United States dollars) by ACA. As a result of my services pursuant to the Consulting Agreement, I received distributions in excess of \$500,000 from China Golden Spring.

4. I was told by ACA that it was aware of various internet posts authored by Hongkuan Li ("Li") about me. The person at ACA who told me these things asked to remain anonymous for fear of retaliation by the Chinese Communist Party. These posts accused me of extreme and improper conduct. Li made these and similar statements through Twitter and his YouTube channel.

5. ACA also informed me that it terminated the Consulting Agreement because of the company's fears that continuing its relationship with China Golden Spring would result in a loss of clients and future business. I was further told that ACA's fears were the result of Hongkuan Li's defamatory internet posts.

6. Between the termination of the Consulting Agreement and today, I have lost income in excess of \$500,000. In addition, I had the reasonable expectation of future income pursuant to the Consulting Agreement.

7. This document was translated and read to me verbatim.



Guo Wengui